

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

September 27, 2021

VIA ECF

Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: United States v. Lawrence Ray
20 Cr. 110 (LJL)**

Dear Judge Liman:

On September 13, 2021, the Court directed the parties to confer regarding a scheduled for the disclosure of expert witnesses and to submit an agreed-upon schedule or competing proposals with respect to expert witnesses. We are now writing to submit a schedule, which has been agreed upon by defense counsel for Mr. Ray and the government.

The proposed schedule below includes, for context, dates that have already been set by the Court in standard type. Proposed dates are in italic type.

Proposed Schedule

Oct. 22, 2021:	Defense search warrant motion deadline
Nov. 12, 2021:	Government response search warrant motion
Nov. 15, 2021:	Notice of intent to offer expert of mental condition or advice of counsel defense <i>Government expert disclosures</i>
Nov. 19, 2021:	Defense search warrant reply deadline
Nov. 25, 2021:	Court closed, Thanksgiving
Dec. 2, 2021:	Hearing on search warrant motion
<i>Dec. 6, 2021:</i>	<i>Defense Daubert/Rule 702/or other substantive motions related to experts</i> <i>Defense expert disclosures</i>

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Dec. 20, 2021: *Government Response (and cross motion related to defense disclosures, including any December 6 disclosures)*

Dec. 24, 2021: Court closed, Christmas Eve

Dec. 31, 2021: Court closed, New Year's Eve

January 3, 2022: *Defense Reply relating to experts*

January 7, 2022: *Oral argument/evidentiary hearing related to experts*

 Motion in limine deadlines (TBD)

 Witness list deadline (TBD)

 3500 disclosure deadline (TBD)

Jan. 17, 2022: Government exhibit list produced (three weeks before trial)

Jan. 24, 2022: Government to produce *Giglio* material (two weeks before trial)

Feb. 7, 2022: Trial

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Marne L. Lenox

Marne L. Lenox, Esq.
Peggy Cross-Goldenberg, Esq.
Allegra Glashausser, Esq.

Counsel for Lawrence Ray

cc: AUSA Danielle R. Sassoon, Esq.
 AUSA Mollie Bracewell, Esq.
 AUSA Lindsey Keenan, Esq.

David Bertan, Esq., Counsel for Isabella Pollok
Jill Shellow, Esq., Counsel for Isabella Pollok
Jacob Barclay Mitchell, Esq., Counsel for Isabella Pollok